

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

ITG/ Burlington Industries LLC - Hurt Plant
797 Main Street, Hurt, Virginia
Permit No. SCRO30379

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, ITG (International Textile Group) has applied for a Title V Operating Permit for its Hurt, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____
Keith M. Sandifer
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Air Permit Manager: _____ Date: _____
David J. Brown

Regional Director: _____ Date: _____
T. L. Henderson

FACILITY INFORMATION

Permittee

ITG (International Textile Group)
804 Green Valley Rd., Suite 300
Greensboro, NC 27408

Facility

ITG/ Burlington Industries LLC – Hurt Plant
797 Main Street
Hurt, VA 24563
County-Plant Identification Number: 51-143-00003

SOURCE DESCRIPTION

NAICS Code: 313311- Broadwoven Fabric Finishing Mills

Burlington Industries, Inc. – The Hurt Plant is a facility for dyeing, finishing and coating of broadwoven synthetic and synthetic wool blend fabrics covered by Standard Industrial Classification (SIC) Codes 2262, 2231, and 2295. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year.

The facility is a Title V major source of nitrogen oxides, sulfur dioxide, and HAPs. This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under Minor NSR Permits dated February 14, 1978, January 3, 1975, June 28, 1993, June 29, 1993, February 13, 1998, March 12, 2001, November 26, 1991 (amended June 28, 2004), and September 30, 2003,

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

See permit Condition II.

EMISSIONS INVENTORY

A copy of the 2005 annual emission update is attached. Emissions are summarized in the following tables.

2005 Actual Emissions

	2005 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
BL1	0.6	63.3	430.7	82.7	139.3
BL2	0.1	1.2	63.8	3.5	9.1
TF1, TF2 & TF6	0.3	0	0	0	0
TF3,4,5,6,10, 11,12,13,14, 15,&16	7.6	0	0	0	0
DR8 & TF17	.04	0	0	0	0
TF18	0.2	0	0	0	0
TF20	1.5	0	0	0	0
WW	9.2	0	0	0	0
LP82,83,85, 86	3.9	0	0	0	0
CB-1	0	0	0	1.70	0
CP-1	0.9	0	0	0	0
Process Natural gas and LPG	0.4	5.4	0	0.5	6.6
Process solvent	6.3	0	0	0	0
Total	31.0	69.9	494.5	88.4	155.0

2005 Facility Hazardous Air Pollutant Emissions

Pollutant	2005 Hazardous Air Pollutant Emission in Tons/Yr
HCl	15.2
HF	1.9

Facility MACT requirements are stated in Conditions XV and XVI of the permit. The requirements are discussed in this document after the requirements for the individual units.

EMISSION UNIT APPLICABLE REQUIREMENTS - Erie City Boiler (BL1)

May be subject to the Boiler MACT (40 CFR 63 Subpart DDDDD) as discussed later.

Limitations

Condition III. A.1. contains the control equipment. This condition is taken from the NSR permit issued February 14, 1978.

Conditions III.A.2. and 3 state the fuel requirement and limits the ash and sulfur content of the coal. These conditions are taken from the NSR permit issued February 14, 1978

The SO₂ emissions are limited by the 1% sulfur content in the coal. The source is required to keep records of the sulfur content of each shipment of coal.

Condition III.A.4. contains the particulate emissions limitation. This condition is taken from the NSR permit issued February 14, 1978.

Particulate emissions are limited to 0.27 lb/MMBtu heat input per the February 14, 1978 permit. Based on AP-42 Section 1.1 Table 1.1-3 (1/95).1 using the particulate emission factor of 66 lb/ton, the maximum particulate emissions will be:

$$\text{PM} = \frac{66 \text{ lb/ton} \times (100\% - 93\%)/100}{26.1 \text{ MMBtu/ton}} = 0.177 \text{ lb/MMBtu}$$

The estimated particulate emissions are less than the allowable as stated in the February 14, 1978 permit. Also, at a frequency not to exceed five years, the permittee shall conduct a stack test for PM from the Erie City (BL1) boiler to demonstrate compliance with the 0.27 lb/MMBtu limit stated in the February 14, 1978 permit.

Condition III. A.5. contains the opacity limitation for new sources from 9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions.

Condition III.A.6. requires that the boiler be operated and maintained properly.

Monitoring

Condition III.C. contains the opacity periodic monitoring. Monitoring of visible emissions will be required of the source to make an observation of the B1 boiler stack (B1) at least one time per week, when the boiler is operating. They are to observe for the presence of visible emissions from the stack. If visible emissions are observed, the permittee will have to take timely corrective action to resume operations without visible emissions or perform a VEE in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions compliance. The permittee will keep a log of observations, any VEE recordings, and any corrective action. If the boiler has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for the stack.

Condition III.C.3. contains the requirement to conduct monitoring as specified in the attached CAM Plan (Attachment A). The coal-fired boiler (B1) is a pollutant specific emissions unit (PSEU) that has the potential to emit more than 100 tons per year of uncontrolled PM emissions.

The two Zurn multicyclones are used to reduce PM emissions. Therefore, since the PSEU has uncontrolled emissions greater than or equal to 100 tons per year, is subject to an emission limitation (0.27 lb/MMBtu) and has a control device, the two Zurn multicyclones, to meet that limit, the two multicyclones are subject to CAM. Since the two multicyclones are grouped together, they were considered as one unit (referred to as the multicyclone unit) for designing the CAM Plan.

Boilers (BL2 and BL3) do not have add-on control equipment and therefore are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM).

Testing

Condition III.C.2. requires that the permittee conduct a stack test for PM (at a frequency not to exceed five years) to demonstrate compliance with the particulate pound per million Btu emission limit contained in Condition III.A.4.

Reporting

The "Recordkeeping and Reporting" requirements of the Title V General Conditions and the CAM Plan (Attachment A) apply to boiler B1.

Recordkeeping

Condition III.B. includes requirements for maintaining records of all monitoring and testing. These records include coal consumption, emission factors, ash and sulfur content of coal, visible emission logs, records of malfunctions, and records required by the CAM Plan.

EMISSION UNIT APPLICABLE REQUIREMENTS - B & W Boiler (BL2)

May be subject to the Boiler MACT (40 CFR 63 Subpart DDDDD) as discussed later.

Limitations

Condition IV.A.1. contains the approved fuels list.

Condition IV.A.2. contains the particulate and sulfur dioxide emissions limits.

The particulate emission calculations demonstration for this boiler is as follows:

Based on AP-42 Section 1.3 Table 1.3-1 (1/95)

No. 6 fuel oil (9.19*2.50(% S) + 3.22) lb PM ÷ $\frac{150,000 \text{ Btu/gal} \times 1000 \text{ gal}}{1,000,000 \text{ Btu}}$ = 0.1746 lb PM
(SCC 10300402) 1,000,000 Btu

assume 150,000 Btu/gal

$167 \text{ MMBtu/hr} \times 0.1746 \text{ lb PM/MMBtu} = 29.16 \text{ lb/hr of PM}$

natural gas	$7.6 \text{ lb PM} \div 1,000 \text{ Btu/ft}^3 \times 1,000,000 \text{ ft}^3$	=	0.0076 lb PM
(SCC 10200601)	1,000,000 Btu		1,000,000 Btu

assume 1,000 Btu/ft³

$167 \text{ MMBtu/hr} \times 0.0076 \text{ lb PM/MMBtu} = 1.27 \text{ lb PM/hr}$

The January 24, 1980 letter states that allowable emissions are 29.63 lb/hr. The PM emissions calculations demonstrate that the boiler PM emissions will not exceed the allowable PM emissions

The SO₂ emission standard is the same as allowed for existing sources (S=2.64K).

Condition IV. A.3. contains the opacity limitation for new sources from 9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions.

Condition IV.A.4. requires that the boiler be operated and maintained properly.

Monitoring

Condition IV.B. contains the opacity periodic monitoring. Monitoring of visible emissions will be required of the source to make an observation of the B2 boiler stack (B2) at least one time per week, when the boiler is operating. They are to observe for the presence of visible emissions from the stack. If visible emissions are observed, the permittee will have to take timely corrective action to resume operations without visible emissions or perform a VEE in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions compliance. The permittee will keep a log of observations, any VEE recordings, and any corrective action. If the boiler has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for the stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include recording the annual throughput of natural gas and #6 fuel oil, the F-factor, pollutant specific emission factors, emission equations, the sulfur content of each shipment of fuel oil, and results of the weekly visual observations.

Testing

The permit does not require source tests. There are no MACT or NSPS requirements for testing of the boiler. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The “Recordkeeping and Reporting” requirements of the Title V General Conditions apply to boiler B2

EMISSION UNIT APPLICABLE REQUIREMENTS - Keystone Boiler (BL3)

May be subject to the Boiler MACT (40 CFR 63 Subpart DDDDD) as discussed later.

Limitations

Condition V.A.1. contains the approved fuels listing.

Condition V.A.2. contains the particulate and sulfur dioxide emissions limits.

The particulate emission calculations demonstration for this boiler is as follows:

No. 6 fuel oil $(9.19 \times 2.50(\% S) + 3.22)$ lb PM ÷ 150,000 Btu/gal x 1000 gal = 0.1746 lb PM
(SCC 10200601) 1,000,000 Btu 1,000,000 Btu
assume 150,000 Btu/gal
 $167 \text{ MMBtu/hr} \times 0.1746 \text{ lb PM/MMBtu} = 29.16 \text{ lb/hr of PM}$

natural gas $7.6 \text{ lb PM} \div 1,000 \text{ Btu/Ft}^3 \times 1,000,000 \text{ Ft}^3 = 0.0076 \text{ lb PM}$
(SCC 10300602) 1,000,000 Btu 1,000,000 Btu
assume 1,000 Btu/Ft³
 $167 \text{ MMBtu/hr} \times 0.0076 \text{ lb PM/MMBtu} = 1.27 \text{ lb PM/hr}$

The SO₂ emission standard for existing sources (S=2.64K).

Condition V. A.3. contains the opacity limitation for existing sources from 9 VAC 5-40-940.

Condition V.A.4. requires that the boiler be operated and maintained properly.

Monitoring

Condition V.B. contains the opacity periodic monitoring. Monitoring of visible emissions will be required of the source to make an observation of the B3 boiler stack (B3) at least one time per week, when the boiler is operating. They are to observe for the presence of visible emissions from the stack. If visible emissions are observed, the permittee will have to take timely corrective action to resume operations without visible emissions or perform a VEE in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions compliance. The permittee will keep a log of observations, any VEE recordings, and any corrective action. If the boiler has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to

once per month for the stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include annual throughput of natural gas and #6 fuel oil, the F-factor, pollutant specific emission factors, emission equations, the sulfur content for each shipment of fuel oil, and results of the weekly visual observations.

Testing

The permit does not require source tests. There are no MACT or NSPS requirements for testing of the boiler. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The “Recordkeeping and Reporting” requirements of the Title V General Conditions apply to boiler B3.

EMISSION UNIT APPLICABLE REQUIREMENTS - Tenter Frames (TF1, TF2, and TF6)

Limitations

Condition VI.A.1. contains the approved fuels listing for the tenter frames (TF1, TF2, and TF6).

Condition VI.A.2. contains the opacity limitation from the March 12, 2001 NSR permit.

Condition VIA.3. contains the volatile organic emissions limit from the March 12, 2001 NSR permit.

Monitoring

Condition VI.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the tenter frame (TF1, TF2, and TF6) stacks at least one time per week, when the tenter frame are operating. They are to observe for the presence of visible emissions from each stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations and any corrective actions. If the tenter frame has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit for tenter frames (TF1, TF2, and TF6). These records include monthly and annual VOC emissions, records of the equations, certified product data sheet, and results of the weekly visual observations.

Testing

The permit does not require source tests. Per the MACT 40 CFR 63, Subpart OOOO, testing is not required. A compliance demonstration is required per 63.4330 and 63.4332 for the dyeing and finishing operations. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting requirements are contained in Condition XV.C. per 40 CFR 63 Subpart OOOO, section 63.4311. The source can make the Subpart OOOO semiannual reports in conjunction with the semiannual Title V permit reports.

EMISSION UNIT APPLICABLE REQUIREMENTS - Tenter Frames (TF3, TF4, TF5, TF7, TF10, TF11, TF12, TF13, TF14, TF15, and TF16)

Limitations

Condition VII. A. contains the opacity limitation for Tenter Frames (TF3, TF4, TF5, TF7, TF10, TF11, TF12, TF13, TF14, TF15, and TF16), which is for existing sources from 9 VAC 5-40-80.

Monitoring

Condition VII.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the tenter frame stacks at least one time per week, when the tenter frames are operating. They are to observe for the presence of visible emissions from each stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations and any corrective actions. If the tenter frame has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include annual mass balance to calculate VOC emissions and HAPs monthly as the sum of each consecutive twelve month period, results of the weekly visual observations, and records of malfunctions which may cause a violation.

Testing

The permit does not require source tests. Per the MACT 40 CFR 63, Subpart OOOO, testing is not required. A compliance demonstration is required per 63.4330 and 63.4332 for the dyeing and finishing operations. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting requirements are contained in Condition XV.C. per 40 CFR 63 Subpart OOOO, section 63.4311. The source can make the Subpart OOOO semiannual reports in conjunction with the semiannual Title V permit reports.

EMISSION UNIT APPLICABLE REQUIREMENTS - TF17 Monforts Tenter Frame and DR8 Santex dryer

Limitations

Condition VIII.A.1. contains the visible emissions limit from the November 26, 1991 NSR permit.

Condition VIII.A.2. contains the VOC emission limits from the June 21, 1993 permit.

Monitoring

Condition VIII.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the tenter frame and dryer stacks at least one time per week, when the tenter frames or dryer are operating. They are to observe for the presence of visible emissions from each stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations and any corrective actions. If the tenter frame or dryer has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the monthly and rolling 12-month total of VOCs and HAPs emitted, records of the equations, certified product data sheets, emission equations, supporting documentation, and the results of the weekly visual observations.

Testing

The permit does not require source tests. Per the MACT 40 CFR 63, Subpart OOOO, testing is not required. A facility-wide compliance demonstration is required per 63.4330 and 63.4332 for the dyeing and finishing operations. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting requirements are contained in Condition XV.C. per 40 CFR 63 Subpart OOOO, section 63.4311. The source can make the Subpart OOOO semiannual reports in conjunction with the semiannual Title V permit reports.

EMISSION UNIT APPLICABLE REQUIREMENTS - DR9 Relaxed dryer

Limitations

Condition IX. A.1. contains the opacity limitation for new sources from 9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions.

Condition IX.A.2. contains the PM, PM10, and VOC emissions limits from Condition 4 of the January 28, 2004 NSR permit.

Monitoring

Condition IX.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the dryer stack at least one time per week, when the dryer is operating. They are to observe for the presence of visible emissions from the stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations and any corrective actions. If the dryer has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include monthly and annual emissions calculations for VOC and PM/PM10 and results of the weekly visual observations.

Testing

The permit does not require source tests. A facility-wide compliance demonstration is required per 63.4330 and 63.4332 for the dyeing and finishing operations. The Department and EPA have

authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting requirements are contained in Condition XV.C. per 40 CFR 63 Subpart OOOO, section 63.4311. The source can make the Subpart OOOO semiannual reports in conjunction with the semiannual Title V permit reports.

EMISSION UNIT APPLICABLE REQUIREMENTS - Monforts Tenter Frame (TF18)

Limitations

Condition X.A.1. contains the visible emissions limit from the June 29, 1993 permit.

Condition X.A.2. contains the VOC emissions limits from the June 29, 1994 permit.

Monitoring

Condition X.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the tenter frame stack at least one time per week, when the tenter frame is operating. They are to observe for the presence of visible emissions from each stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations and any corrective actions. If the tenter frame has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the monthly and rolling total of VOCs emitted and the results of the weekly visual observations from the tenter frame stacks.

Testing

The permit does not require source tests. A facility-wide compliance demonstration is required per 63.4330 and 63.4332 for the dyeing and finishing operations. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting requirements are contained in Condition XV.C. per 40 CFR 63 Subpart OOOO, section 63.4311. The source can make the Subpart OOOO semiannual reports in conjunction with the semiannual Title V permit reports.

EMISSION UNIT APPLICABLE REQUIREMENTS - Monforts Tenter Frame (TF20)

Limitations

Condition XI.A.1. contains the approved fuel listing for the Monforts Tenter Frame (TF20) from the April 3, 2001 permit..

Condition XI.A.2. contains the visible emission limits from the April 3, 2001 permit.

Condition XI.A.3. contains the emission limits for tenter frame(TF20) from the April 3, 2001 permit.

Condition XI.A.4. contains the requirement for a fume oxidizer and the operational parameters for the oxidizer from the April 3, 2001 NSR permit.

Condition XI.A.5. contains the notification requirements for a malfunction of the facility or related air pollution equipment that may cause excess air emissions from the April 3, 2001 NSR permit.

Condition XI.A.6. contains the measures that the source is to take to minimize the duration and frequency of excess emissions per the April 3, 2001 NSR permit.

Monitoring

Condition XI.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the tenter frame stack at least one time per week, when the tenter frame is operating. They are to observe for the presence of visible emissions from the stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations and any corrective actions. If the tenter frame has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the listing in Condition XI.C. from the April 3, 2001 NSR

permit.

Testing

The permit does not require source tests. A facility-wide compliance demonstration is required per 63.4330 and 63.4332 for the dyeing and finishing operations. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting requirements are contained in Condition XV.C. per 40 CFR 63 Subpart OOOO, section 63.4311. The source can make the Subpart OOOO semiannual reports in conjunction with the semiannual Title V permit reports.

EMISSION UNIT APPLICABLE REQUIREMENTS - SS1 and SS2 Sodium Sulfate Storage

Limitations

Conditions XII.A.1. and 2 contain the particulate emissions control requirements from the June 28, 1993 NSR permit.

Condition XII.A.3 contains the annual usage of sodium sulfate from the June 28, 1993 permit.

Condition XII.A.4. contains the visible emission limits from the May 8, 1993 permit.

Condition XII.A.5. contains the measures that the source is to take to minimize the duration and frequency of excess emissions per the June 23, 1993 NSR permit.

Condition XII.A.6. contains the requirement for the source to notify the South Central Regional Office in event the facility or related air pollution control equipment fails or malfunctions per the June 23, 1993 NSR permit.

Condition XII.A.7. requires written operating procedures for the air pollutions control equipment and operator training per the June 28, 1993 NSR permit.

Monitoring

Condition XII.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the storage silo vent fabric filters at least one time per week, when the storage silos are operating. They are to observe for the presence of visible emissions from each stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations

and any corrective actions. If the storage silo has not operated during the week, this fact shall be noted in the log, and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include annual throughput of sodium sulfate and results of weekly visual observations.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The "Recordkeeping and Reporting" requirements of the Title V General Conditions apply to the sodium sulfite storage.

EMISSION UNIT APPLICABLE REQUIREMENTS - Wastewater Treatment (WW)**Limitations**

None

Monitoring

There are no monitoring requirements for this permit.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include an annual mass balance of calculate volatile organic compound and HAP emissions, certified product data sheet, emission equations, and all supporting documentation.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or

standard.

Reporting

The “Recordkeeping and Reporting” requirements of the Title V General Conditions apply to the wastewater treatment.

EMISSION UNIT APPLICABLE REQUIREMENTS - (Fabric Finishing)

Limitations

Conditions XIV.A.1., 2., and 3 contain the control requirements for the flame singer (SG-1) from the September 30, 2003 NSR permit.

Condition XIV.A.4. contains the approved fuels for the flame singer (SG-1) from the September 30, 2003 NSR permit.

Condition XIV.A.5. contains the emissions limits for the low pressure dye beck system (LP-82, LP-83, LP-85 and LP-86) from the September 30, 2003 NSR permit.

Condition XIV.A.6. contains the emissions limits for the Kenyon carbonizer (BC-1) from the September 30, 2003 NSR permit.

Condition XIV.A.7. contains the emissions limits for the flame singer (SG-1) from the September 30, 2003 NSR permit.

Condition XIV.A.8. contains the visible emissions limit for the flame singer (SG-1) and carbonizer (CB01b) stacks from the September 30, 2003 NSR permit.

Condition XIV.A.9. contains the requirement to reduce the level of operation to avoid violation of any primary ambient air quality standard per the September 30, 2003 NSR permit.

Condition XIV.A.10. contains measures to minimize the duration and frequency of excess emissions per the September 30, 2003 NSR permit.

Monitoring

Condition XIV.B. contains the opacity periodic monitoring.

Monitoring of visible emissions will be required of the source to make an observation of the flame singer (SG1-1) and the carbonizer (CB1-1a and CB1-1b) stacks at least one time per week, when the flame singer and the carbonizer are operating. They are to observe for the presence of visible emissions from each stack. If visible emissions are observed, the permittee will take timely corrective action to resume operations without visible emissions to assure visible emissions compliance. The permittee will keep a log of observations and any corrective actions. If the flame singer or the carbonizer has not operated during the week, this fact shall be noted in the log,

and that the visible emission observation was not required. Also, if visible emissions have been conducted for 12 consecutive weeks and no visible emissions are seen, the permittee may reduce the monitoring frequency to once per month for that stack.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include monthly and annual emissions calculation for VOC from the low pressure dye becks, monthly and annual emissions calculations from the Kenyon carbonizer, monthly and annual emissions calculations for VOC from the flame singer from the September 30, 2003 NSR permit. These records include the results of weekly visual observations.

Testing

The permit does not require source tests. A facility-wide compliance demonstration is required per 63.4330 and 63.4332 for the dyeing and finishing operations. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The “Recordkeeping and Reporting” requirements of the Title V General Conditions apply to the wastewater treatment.

EMISSION UNIT APPLICABLE REQUIREMENTS – MACT Subpart OOOO – Fabric and Textile Dyeing and Finishing Operations

Limitations

Condition XV.A. contains the limitations for the dyeing and finishing operations.

Work Practice Standards

Since the facility does only dyeing and finishing (they will use the compliant material option or the emission rate without using add-on controls), they are not required to meet any work practice standards in 63.4293 (a).

Notifications

Condition XV.B. contains the notifications requirements to comply with the MACT, specifically 63.4310 and 40 CFR 63 Subpart A.

Monitoring

There no monitoring requirements required in the MACT for the dyeing and finishing operations.

Recordkeeping

Condition XV.D. contains the recordkeeping requirement to comply with the MACT, specifically 63.4312 and 40 CFR 63 Subpart A.

Testing

Performance testing of the dyeing and finishing operations is not required, since add-on controls are not being used. Initial compliance with the emission limitation shall be demonstrated per 63.4330. Continuous compliance with emission limitation is demonstrated by complying with the MACT 63.4332.

Reporting

Condition XV.C. contains the reporting requirements to comply with the MACT, specifically 63.4311.

FACILITY WIDE REQUIREMENTS FOR HAZARDOUS AIR POLLUTANTS EMISSIONS

The facility currently has the potential to emit hazardous air pollutants (HAPs) in quantities greater than the 10/25 ton major source HAP thresholds. Therefore, the facility is subject to the regulations under 40 CFR 63 (National Emissions Standards for Hazardous Air Pollutants for Source Categories), referred to as the MACT regulations. There is one MACT regulation that is currently applicable and one that may become applicable later:

- 1) Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR
The requirements are addressed above. The compliance date was May 20, 2006.
- 2) Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63 Subpart DDDDD): An existing boiler (BL1, BL2, and BL3) or process heater must comply with this subpart by the compliance date of September 13, 2007.

The permit includes the requirement to comply with each of the MACTs listed above by their respective compliance dates, unless the facility obtains federally enforceable limits (synthetic minor limits) on its facility-wide emissions of HAPs to below the major source thresholds prior to the compliance dates. If the source does not become a synthetic minor source of HAPs its Title V permit will need to be modified to include more detailed requirements for each MACT.

Streamlined Requirements

None

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement NO. 3-2003”.

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas]

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

STATE ONLY APPLICABLE REQUIREMENTS

There are no state only requirements.

FUTURE APPLICABLE REQUIREMENTS

The facility will be subject to 40 CFR 63 Subpart OOOO - National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. The compliance date is September 13, 2007.

INAPPLICABLE REQUIREMENTS

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

See permit Condition XVII.

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

Other Considerations

The source has indicated its intent to close by the end of the second quarter of 2007.

PUBLIC PARTICIPATION

The proposed permit will be place on public notice in the Altavista Journal from
____[date]_____ to ____[date]_____ .